

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, et al.	:	CIVIL ACTION NO. C-1-01-467
	:	
Plaintiffs	:	JUDGE: SANDRA S. BECKWITH
	:	
vs.	:	
	:	<u>PLAINTIFFS' IDENTIFICATION</u>
UNITED PAPERWORKERS	:	<u>OF WITNESSES</u>
INTERNATIONAL UNION (PACE)	:	
LOCAL 1967, et al.	:	
	:	
Defendants	:	

Now come Plaintiffs, by and through counsel, and hereby submit their identification of witnesses they intend to call at trial.

1. Plaintiffs:

Mr. Dorman G. Angel
2951 West Elkton Road
Hamilton, OH 45011
Phone: (513) 726-4264

Mr. James W. Laycock
2975 Freeman Avenue
Hamilton, OH 45015
Phone: (513) 867-1741

Mr. Maurice Kollstedt
56 Linda Lane
Hamilton, OH 45011

Mr. Michael S. Baker
5236 Edison Road
Camden, OH 45311
Phone: (937) 452-5553

Mr. James Boggs

1650 Chippewa Drive
Hamilton, OH 45013
Phone: (513) 887-7592

Mr. Jim R. Bowling
535 Northwood Terrace
Hamilton, OH 45013
Phone: (513) 887-7340

Mr. Ronald Bridge
2056 West Elkton Road
Hamilton, OH 45013
Phone: (513) 896-5421

Mr. Donald Bridge
5267 West Elkton-Gifford Road
Middletown, OH 45042
Phone: (937) 787-4848

Mr. Norman Brown
4303 Nichols Road
Oxford, OH 45056
Phone: (513) 523-0850

Mr. Charles Campbell
5658 Indian Hill Court
Fairfield, OH 45011
Phone: (513) 896-6478

Peter L. Cecere, Jr.
524 Springvale Drive
Hamilton, OH 45013
Phone: (513) 887-1891

Mr. Robert D. Chestnut
4309 Hamilton Scipio Road
Hamilton, OH 45013
Phone: (513) 868-2335

Mr. Coney Chitwood
54 Twinbrook Drive

Hamilton, OH 45013
Phone: (513) 867-9850

Ms. Theresa Creech
1272 Northern Road
Somerville, OH 45064
Phone: (513) 726-5766

Ms. Olivia J. Day
1480 Clovernoll Drive
Cincinnati, OH 45231
Phone: (513) 521-1904

Mr. Gary L. Ervin
P.O. Box 186
Seven Mile, OH 45062-0186
Phone: (513) 737-6558

Mr. Dennis Felts
604 Fairhaven Drive
Hamilton, OH 45013
Phone: (513) 867-1407

Mr. Robert Follick
2860 High Street
Hamilton, OH 45013
Phone: (513) 863-5346

Mr. James A. Frost
1294 Susan Drive
Hamilton, OH 45013
Phone: (513) 896-4166

Mr. Marc Fullen
P.O. Box 531
Crittendon, KY 41030
Phone: (859) 363-0889

Mr. Ben Gainey
1238 Gilday Court
Hamilton, OH 45013

Phone: (513) 896-4319

Mr. David E. Glaab
680 Innsbrooke Lane
Hamilton, OH 45011
Phone: (513) 874-3435

Mr. Larry N. Glore
561 S. Washington Blvd.
Hamilton, OH 45013
Phone: (513) 844-1145

Mr. David Green
1871 Bunker Hill Woods Road
Oxford, OH 45056
Phone: (513) 756-1294

Mr. Charles R. Hardix
188 Progress Avenue
Hamilton, OH 45013
Phone: (513) 863-5092

Mr. Michael Hart
5901 Morningside Drive
Fairfield, OH 45014
Phone: (513) 858-3808

Mr. Gary Hensley
415 Fenwick Place
Fairfield, OH 45014
Phone: (513) 896-1638

Mr. Robert L. Holland
8128 Walleye Drive
Brookville, IN 47012
Phone: (765) 647-4568

Mr. Elden Houston
1812 Eaton Road, Apt. 8
Hamilton, OH 45013
Phone: (513) 867-8528

Mr. Douglas Howard by and through his administratrix Barbara Howard
1328 Carver Place
Hamilton, OH 45011
Phone: (513) 856-7417

Mr. Russell Howard
726 Ludlow Street
Hamilton, OH 45013

Mr. James E. Johns
60 Chamberlin Court
Hamilton, OH 45013
Phone: (513) 868-8876

Mr. Robert L. Johnson
1248 Lane Street
Hamilton, OH 45011
Phone: (513) 867-0739

Ms. Gladys Jones
50 S. Main Street, Apt. B
Middletown, OH 45044
Phone: (513) 423-5184

Mr. Jeffrey L. Jones
1160 Dennis Lane, #2
Hamilton, OH 45013
Phone: (513) 314-1406

Mr. Jeffrey R. Kittner
5352 Chateau Way
Fairfield, OH 45014
Phone: (513) 939-3488

Mr. Kenny Lakes
2131 Bevington Lane
Hamilton, OH 45013
Phone: (513) 887-1995

Mr. Greg C. Laney
77 Littlebrook Drive
Fairfield, OH 45014
Phone: (513) 894-1549

Mr. Clark A. Latimer
2376 Morgan Ross Road
Hamilton, OH 45013
Phone: (513) 738-4657

Mr. Dale S. Lentz
50 Rockford Drive
Hamilton, OH 45013
Phone: (513) 844-2879

Ms. Vivian Livingston
11619 Morrocco Court
Cincinnati, OH 45240
Phone: (513) 851-0987

Ms. Diana McGuire
740 Williams Avenue
Hamilton, OH 45015-1161
Phone: (513) 328-3390

Mr. Troy Messer
1724 Bell Road
Hamilton, OH 45013
Phone: (513) 738-0534

Mr. Michael Mick
109 Webster Avenue
Hamilton, OH 45013
Phone: (513) 856-7797

Mr. Hargis Miller, Jr.
91 Saragasso Lane
Winterhaven, FL 33880
Phone: (863) 294-6950

Mr. Wade Nunn, Jr.
607 Ridgelawn Avenue
Hamilton, OH 45013
Phone: (513) 868-7858

Mr. Michael Oliver

213 South Main
Seven Mile, OH 45062
Phone: (513) 726-5165

Ms. Sandra Parks
2465 Lanes Mill Road
Hamilton, OH 45013
Phone: (513) 863-2225

Mr. Michael S. Potts
1149 San Angelo Drive
Hamilton, OH 45013
Phone: (513) 869-8260

Mr. John H. Rice
60 Cranbrook Drive
Hamilton, OH 45011
Phone: (513) 896-1907

Mr. Garrett Richard
324 Chestnut Street
Hamilton, OH 45011
Phone: (513) 863-6920

Mr. Edward Roberts
447 Emerson Avenue
Hamilton, OH 45013
Phone: (513) 737-8158

Mr. Jamie L. Roy
3540 Indian Creek Road
Oxford, OH 45056
Phone: (513) 757-4070

Mr. Donald C. Ruppert
2441 Queen Mary Lane
Hamilton, OH 45013
Phone: (513) 737-9449

Ms. Barbara Sauter
4601 Layhigh Road

Hamilton, OH 45013
Phone: (513) 738-1044

Mr. Stephen E. Sauter
4601 Layhigh Road
Hamilton, OH 45013
Phone: (513) 738-1044

Mr. Ernest Shackleford
1130 Stahlheber Road
Hamilton, OH 45013
Phone: (513) 894-8120

Mr. Michael J. Sheard
105 Justin Place
Hamilton, OH 45013
Phone: (513) 868-3522

Mr. David E. Smith, Jr.
999 San Angelo Drive
Hamilton, OH 45013
Phone: (513) 887-2851

Ms. Sharon Sutton
414 Hampshire Drive, 24H
Hamilton, OH 45011
Phone: (513) 896-1316

Mr. George Tatum
994 Bauer Road
Somerville, OH 45064
Phone: (513) 726-5825

Mr. Jimmy W. Tatum
6205 Shearwater Drive
Fairfield, OH 45014
Phone: (513) 858-1799

Ms. May Turner
1732 Old Oxford Road
Hamilton, OH 45013

Phone: (513) 887-0260

Mr. David T. Waltner
21 Olympus Court
Hamilton, OH 45013
Phone: (513) 863-2336

Mr. Kenneth R. Webb
1430 Park Avenue
Hamilton, OH 45013
Phone: (513) 844-1008

Ms. Teri L. Webb
1430 Park Avenue
Hamilton, OH 45013
Phone: (513) 844-1008

Mr. Eugene V. Weisbrod
880 Mill Street
Hamilton, OH 45013
Phone: (513) 868-7673

Ms. Berneda Weisbrod
880 Mill Street
Hamilton, OH 45013
Phone: (513) 868-7673

Mr. Donald L. Whitaker
1205 Reservoir Street
Hamilton, OH 45011
Phone: (513) 867-0685

Mr. Ellsworth Williamson
4780 Mosiman Road
Middletown, OH 45042
Phone: (513) 423-1273

Mr. Richard J. Whitehill
406 N. Main Street
Seven Mile, OH 45062
Phone: (513) 726-4512

Mr. David Wynn
4270 State Route 276
Batavia, OH 45103
Phone: (513) 724-7922

Mr. Michael F. Baker, II
4162 Jennifer Drive
Hamilton, OH 45013
Phone: (513) 738-4307

Mr. Kenneth Bauer
6255 Firestone Drive
Fairfield, OH 45014
Phone: (513) 829-4720

Mr. Kenneth Johnson
11899 Hitchcock Road
Cincinnati, OH 45240
Phone: (513) 825-4242

Mr. Jimmy Taylor
2863 Cedar Grove Court
Hamilton, OH 45011
Phone: (513) 726-6826

Mr. Michael Thomas
256 Gentle Breeze Drive
Clermont, FL 34711
Phone: (352) 243-0501

Mr. Joseph Born
2415 Minton
Hamilton, OH 45013
Phone: (513) 863-8166

Mr. Larry Combs
5769 Levy Drive
Fairfield, OH 45014
Phone (513) 829-2334

Plaintiffs will testify regarding the allegations contained in their complaint, their knowledge of the collective bargaining agreement, the effects bargaining package, their employment with International Paper and Smart Paper, their termination, and their damages.

2. Tim Bray
PACE Local 1967
1050 Millville Avenue
Hamilton, OH 45013

Mr. Bray will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

3. Ken Stanifer
1780 Sunset Avenue
Hamilton, OH 45013

Mr. Stanifer will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

4. Gerald Johnston
660 Northland Boulevard, Suite 25
Cincinnati, OH 45240

Mr. Johnston will testify as to his knowledge of the negotiation and application of the collective bargaining agreement, the effects benefit package, and the allegations contained in Plaintiffs' complaint.

5. Mary Rita Weissman
c/o Stanley F. Lechner, Esquire
Morgan, Lewis & Bockius
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Ms. Weissman will testify as to her knowledge as Human Resources consultant for Defendant Smart Paper and the allegations contained in Plaintiffs' complaint.

6. George Payton
Human Resources Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Payton will testify as to his knowledge as Human Resources Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

7. Milton Lewis
Representative
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Lewis will testify as to his knowledge as a representative for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

8. Tom Stewart
Labor Relations Specialist
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Stewart will testify as to his knowledge as Labor Relations Specialist for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

9. Annetta Johnson

Human Resources Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Ms. Johnson will testify as to her knowledge as Human Resources Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

10. Dan Mahew
Manager
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Mahew will testify as to his knowledge as Manager for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

11. Holcut Philips
Representative
c/o Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197

Mr. Philips will testify as to his knowledge as a representative for Defendant International Paper and the allegations contained in Plaintiffs' complaint.

12. Irvin Sandlin
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Sandlin will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

13. Pat Reese
c/o James B. Robinson, Esquire

Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Reese will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

14. Pearl Hicks
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Ms. Hicks will testify regarding union meetings, her knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

15. Paul Houston
c/o James B. Robinson, Esquire
Kircher, Robinson & Welch
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202

Mr. Houston will testify regarding union meetings, his knowledge of the executive board, and the allegations contained in Plaintiffs' complaint.

16. Larry McCreary
c/o Robert I. Doggett, Esquire
6740 Clough Pike, Room 200
Cincinnati, OH 45244

Mr. McCreary will testify as to his attempt to file a grievance relating to the sale and the effects bargaining agreement, the actions taken by the Defendants prohibiting the prosecution of the grievance and other issues related therein.

17. A representative from International Paper who may testify as to the sale of the B Street Mill to Smart Papers and the specifics regarding that transaction. That person will be identified upon further discovery.
18. A representative from Smart Paper who may testify as to the sale of the B Street Mill to Smart Papers and the specifics regarding that transaction. That person will be identified upon further discovery.

19. Plaintiffs reserve the right to call any individual identified by the Defendants.
20. Plaintiffs reserve the right to add any individuals who through the course of discovery within the next month it becomes apparent that their testimony is required for trial.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

JACOBS, KLEINMAN, SEIBEL & MCNALLY

Trial Attorneys for Plaintiffs

2300 Kroger Building

1014 Vine Street

Cincinnati, OH 45202

Tele: (513) 381-6600

Fax: (513) 381-4150

E-mail: mbyrne@jksmlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Grant S. Cowan, Esquire
Frost Brown Todd LLC
Attorney for Defendant
International Paper Company
2200 PNC Center
201 E. Fifth Street
Cincinnati, OH 45202
gcowan@fbtlaw.com

Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197
vincent.miraglia@ipaper.com

W. Carter Younger, Esquire
McGuire Woods LLP
Attorney for Defendant
International Paper Company
One James Center
901 E. Cary Street
Richmond, VA 23219
cyounger@mcguirewoods.com

James B. Robinson, Esquire
Kircher, Robinson & Welch
Attorney for Defendant
PACE International Union
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202
kircher@fuse.net

Robert J. Hollingsworth, Esquire
Cors & Bassett
Attorney for Defendant Smart Papers, LLC
537 E. Pete Rose Way, Suite 400
Cincinnati, OH 45202
rjh@corsbassett.com

Stanley F. Lechner, Esquire
Laine S. Posel, Esquire
Morgan, Lewis & Bockius
Attorney for Defendant
Smart Papers, LLC
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
slechner@morganlewis.com
lposel@morganlewis.com

Robert I. Doggett, Esquire

Attorney for Defendant
PACE Local 5-1967
6740 Clough Pike, Room 200
Cincinnati, OH 45244
rdoggett@sprynet.com

I also certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

Ronald Morgan, Esquire
Morgan & Associates
118 South Second Street
Hamilton, OH 45011

Charles P. Groppe, Esquire
Morgan, Lewis & Bockius
Attorney for Defendant
Smart Papers LLC
111 Pennsylvania Avenue, NW
Washington, DC 20004

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

Attorney for Plaintiffs